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March 19, 2010

VIA CM/ECF

Honorable Novalyn L. Winfield
United States Bankruptcy Court
MLK Federal Building
50 Walnut Street, 3rd Fl.
Newark, NJ 07102

Re: *In re Stanley F. Kleinschmidt Jr. and Corinne A. Kleinschmidt*
Case No. 09-13545
Adv. Proc. No. 09-2606
Our File No. 12298.76989

Dear Judge Winfield:

This firm represents David Wolff, the Chapter 7 Trustee in the above case. Please accept this letter in lieu of counsel's appearance at the adjourned hearing on Garces & Grabler's Motion to be Relieved as Debtors' Counsel (the "Motion") scheduled for Monday March 22, 2010 at 9:00 a.m.

At the initial hearing on the Motion, Your Honor inquired into what administrative tasks remained on behalf of the Chapter 7 Trustee, and requested a status report. Your Honor also recognized that the Trustee had not yet reviewed the Debtors' tax returns, which as of the initial hearing date, had not yet been filed. Notwithstanding, this office did not receive the Debtors' past four years of tax returns until March 18, 2010, and we have just begun to undertake review of the same, including confirmation that the same have in fact been filed. Accordingly, the Trustee respectfully requests an additional month to report back to the Court on the status of the bankruptcy case pending review of the tax returns.

Respectfully submitted,

/s/ Terri Jane Freedman

Terri Jane Freedman

cc: Michael R. Speck, Esq. (via email)
David Wolff, Chapter 7 Trustee

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